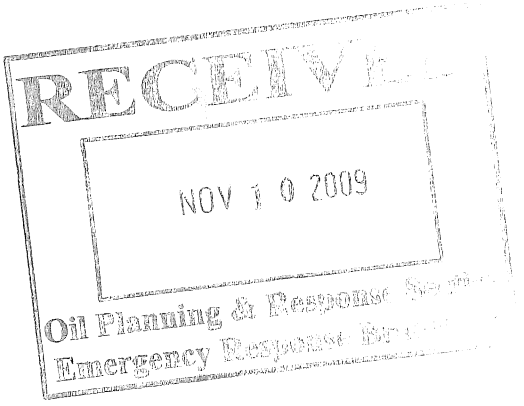
LUBE-TECH
LUBRICATION TECHNOLOGIES, INC.

900 MENDELSSOHN AVENUE NORTH
GOLDEN VALLEY, MN 55427

CORPORATE: 763-545-0707
CUSTOMER SERVICE: 651-636-7990

November 5, 2009



Mr. Shitien Yang, Ph.D.
SPCC Inspector Grantee
U.S. Environmental Protection Agency Region 5
77 West Jackson Blvd. (SE-5J)
Chicago, IL 60604-3590

Mr. Yang,

Enclosed is our updated SPCC plan for your review. I trust you will find everything in order.

Our rail commitment has been completed and my e-mail dated 11/02/2009 contained pictures of both the form work and final concrete barrier

Please contact me directly with any questions or concerns.

Best Regards,

Matt Finley
General Manager
Lubrication Technologies, Inc.
858 Transfer Road
St. Paul, MN 55114
Direct: 763-417-1354
Cell: 612-387-6551
E-mail: mattfin@lube-tech.com

Spill Prevention Control And Countermeasure Plan

&

MINNESOTA EMERGENCY REPONSE PLAN (Appendix D)

Lubrication Technologies
858 Transfer Road
St. Paul, MN

Prepared by:
Vieau Associates Inc.
7710 Computer Avenue Suite 102
Edina, Minnesota 55435

October 23, 2009

TABLEOF CONTENTS

LIST OF APPENDICES

1.0 INTRODUCTION

The St. Paul Oil Storage facility has been owned and operated by Lubrication Technologies since July 1, 2007. The facility was constructed in 2002, and meets the Minnesota Pollution Control Agency (MPCA) October 31, 2003 requirements to upgrade aboveground storage tanks (ASTs) facilities. The bulk facility is oil storage and transfer facility with ninety four (94) aboveground bulk oil storage tanks, one (1) diesel tank, numerous totes and 55-gallon drums and four- transfer areas. The total storage capacity of the 94 aboveground petroleum tanks is approximately 933,000 gallons. Various motor oils, gear oil, and anti freeze are stored and transferred at this facility (see site facility map).

Lubrication Technologies has taken preventive measures to reduce the potential for spills, leaks and accidental discharges of oil and oil products. These preventive measures include:

- Tank Management Program
- In-House Spill Response Procedures
- Ongoing Employee Spill Response Training
- Contingency/Emergency Response Plan
- Ongoing Spill Prevention Engineering Evaluations

Lubrication Technologies has prepared and implemented this SPCC Plan for the entire facility as an additional preventive measure. Spill potential at this facility is primarily from discharge of the above described oil products. This SPCC Plan addresses spill prevention, recognition, notification, reporting, containment, cleanup and disposal procedures in the event of leaks or spills.

2.0SETTING

2.1 Site

The facility is located in St. Paul, Minnesota. The site's location is illustrated in the site location map, and the facility site map. The site address is:

Lubrication Technologies, Inc.
858Transfer Road
St. Paul, Minnesota
(763) 545-0707

The owner's address is:

Lubrication Technologies, Inc.
900 Mendelssohn Ave. N.
Golden Valley, MN 55427

Bill Boisvert is the person responsible for the Plan implementation.

Scott Bergman is the primary contact for issues regarding this SPCC Plan. He may be reached at:
763-417-1289

The St. Paul Oil Storage facility is zoned for industrial use, and is surrounded by industrial and commercial properties. The facility is currently supplied with city water and sewer.

2.2 Surrounding Area

The St. Paul oil storage facility is located on the east side of Transfer Road. The bulk facility is located on the northeast edge of the City of St. Paul approximately 500 feet west of a small pond and approximately 1-1/2 miles east of the Mississippi River.

The general drainage pattern on site is toward the west toward a storm sewer. Soil percolation, evaporation, and runoff are the most common mechanisms for moisture removal from the site.

3.0 REGULATORY REQUIREMENTS

The SPCC Plan satisfies the requirements of regulations presented below. This document also describes the facilities and procedures used to prevent discharges of oil, or petroleum-related materials originating at the facility from reaching any navigable waters of the United States or its adjoining shoreline.

3.1 U.S. Environmental Protection Agency (EPA)

Title 40 CFR Part 112 of the Federal Water Pollution Control Act (FWPCA), as amended by the Clean Water Act of 1977, requires owners or operators of onshore facilities that have discharged or, due to their location, could reasonably be expected to discharge oil in harmful quantities into or upon the navigable waters of the United States or adjoining shorelines to prepare, in writing, an SPCC Plan. Title 40 CFR part 112 exempts facilities from SPCC requirements when:

- Total UST storage volume is less than 42,000 gallons.
- Total aboveground storage tank (AST) storage volume is less than 1,320 gallons providing that no individual AST exceeds 660 gallons.

Title 40 CFR Part 112 establishes procedures, methods, equipment and other requirements for equipment to prevent the discharge of oil.

To satisfy the most stringent requirements of 40 CFR Part 112, the SPCC Plan must:

a. Be reviewed and certified by a registered Professional Engineer (PE). After on-site examination of the plant and familiarity with 40 CFR, Parts 110, 112 and related regulations, the PE must certify that the plan was prepared in accordance with good engineering practices.
b. Be kept current.
c. Have original document and changes reviewed and certified by a registered PE and to be made available for on-site review by representatives of the EPA Regional Administrator.
d. Be reviewed and updated within six months of plant maintenance which materially affects the potential for discharge of oil or hazardous substances into or upon navigable waters.
e. Be reviewed and amended by EPA Regional Administrator as required in 40 CFR Part 112.4 when:

    - A facility has spilled more than 1,000 U.S. gallons of oil into navigable waters in a single spill.
    - Two reportable spills have occurred within any 12 month period.

f. Be reviewed and evaluated at least once every five years and amended to include more effective prevention and control technologies if:

- Such technologies will significantly reduce likelihood of a spill from the plant.
- Such technologies have been field-proven at the time of the review.
- Any amendments, except changes to the contact list, must be certified by a registered PE.

g. Be fully implemented to include required construction, installation of equipment, periodic health monitoring, and safety and occupational health training of personnel.
h. Include spill briefings for operating personnel, which will be conducted at least once a Year.
i. Have resources identified for possible use by a Regional Response Team.
j. Establish spill prevention training to be scheduled, at a minimum, once a year to prevent spills and releases.
k. Establish a spill response-training program for applicable personnel.

4.0 SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

4.1 Purpose and Scope

The purpose of this plan is to identify potential sources of oil and petroleum-related product discharges and facilities and procedures (existing or required) to prevent and contain a spill. It is aimed primarily at the prevention of spills and surface water contamination.

To that end, this SPCC Plan addresses:

- Oil material storage and handling facilities.
- An inventory of containment vessels including location and capacity.
- Description of secondary containment and diversionary structures and drainage flow patterns.
- Procedures and methods used to prevent discharges to navigable waters.
- Procedures for operations, inspections and record keeping.
- Recommended corrective measures.

This SPCC Plan encompasses only those sites identified in October 2009 as potential spill sites.

4.2 Spill Reporting Requirements (40 CPR Part 112.4)

A spill is any discharge of petroleum product greater than five gallons. A spill event is defined as a release of petroleum, which reaches navigable waters or their adjoining shorelines in hazardous quantities. A hazardous quantity is defined as that which causes a visible sheen. When a spill or spill event occurs, the following personnel must be notified immediately:

Police/Fire/Ambulance.....911

Minnesota Pollution Control Agency 651-649-5451
.....I-800-422-0798

Scott Bergman ..... (business) 763-417-1289
.....(cell) 612) 366-6369

When a spill event occurs, 1000 gallons or greater, the following additional organization must be notified:

National Response Center I-800-424-8802

Two spill events of an incident 42 gallons or greater occurring within a 12-month period or a spill event of more than 1,000 gallons reaching the navigable waters or an adjoining

shoreline must be reported to the EPA Regional Administrator within 60 days of the occurrence [Part 112.4(a)] at the following address (use one of the following if applicable):

Regional Administrator
U.S. Environmental Protection Agency Region V
77 West Jackson Boulevard Chicago, Illinois 60604
(312) 353-2318

This report must include:

- Name, address and telephone number of the facility
- Name, address and telephone number of the owner or operator
- Date of initial facility operation
- Maximum storage capacity and normal daily throughput of the facility
- Description of the facility with maps and flow diagrams
- One copy of this SPCC Plan with any amendments
- Date, time, cause of incident, including failure analysis of system where spill occurred
- Name and quantity of material(s) spilled
- Assessment of actual or potential hazards to the environment and/or human health
  Action taken to contain/cleanup the spill; description of equipment repairs/replacements
- Preventive measures taken or contemplated to minimize recurrence

A copy of this report must also be sent to the MPCA of [Part 112.4(c)] at the following address:

Minnesota Pollution Control Agency
Tanks and Spills Section
520 Lafayette Road
St. Paul, Minnesota 55 155
(651) 296-8100

4.3 Amendments by Owners or Operators (40 CFR Part 112.5)

This SPCC Plan will be amended to incorporate any change Lubrication Technologies makes to its St. Paul Oil Storage facility design, construction, operation or maintenance that affects the potential for spills and/or leaks [Part 112.5(a)]. Any amendment will be implemented within six months after a change occurs.

This SPCC Plan will be reviewed and evaluated by facility personnel every five years regardless of whether any changes have taken place at the facility [Part 112.5(b)]. If, at that time, it is decided that more effective prevention and control measures can be taken, this Plan will be amended to accommodate those measures. Any amendment will be implemented before an improvement is deemed necessary. All amendments to this Plan will be certified by a Registered PE [112.5(c)].

4.4 Twelve-month Spill History (40 CFR Part 112.7(a))

There have been no spill events during the past 12 months.

4.5 Prediction of Spill Quantity, Direction and Rate of Flow (40 CFR Part 112.7(b))

The major causes of potential discharges at the facility are:

- Spills during transfer operations
- Leaking tanks and piping
- Tank overflows or rupture

The main potential for release of a large quantity (greater than five gallons) of petroleum would be during an oil transfer or overfilling of the aboveground storage tanks (within building). The facility has taken precautions to help prevent a release at these locations. These include a written operating procedure for transfer operations and safety equipment (See Appendix A). Should a release occur, all the tanks are located within a concrete building with a concrete floor with metal containment walls that surrounds the aboveground tanks, or in secondary containment basin located on the west side of the warehouse. The warehouse concrete building and concrete floor is impervious enough to hold product for 72 hours should a spill occur. The warehouse aboveground tanks consist of four (4) 8,000-gallons tanks, seventy-seven (77) 9,500-gallon tanks, twelve (12) 2,200-gallon tanks, and numerous totes and 55-gallon drums inside a watertight warehouse. One (1) 2,000-gallon diesel tank is located outside on the west side of the warehouse building. The locations of the loading and unloading areas and the storage tanks are shown on the site facility map.

Small leaks/releases could occur from faulty valves, fittings, seals and piping. Because of the many potential sources for these types of leaks, the facility has instituted a daily walk down of facility components to prevent and reduce releases by this type of system failure. Piping inspections include all pumps, meters, flange joints, expansion joints, valves, catch pans and pipe supports. Soil staining, visible leaks, oil sheens and unusual odors are noted. See Appendix A for a copy of the inspection form.

Although the potential for a large release by failure of a tank or overfilling of a tank is not as great as in the previously discussed releases, the potential effects are much greater because of the larger release volume. In order to reduce the effects of a release of petroleum from these sources, secondary containment has been provided for the facility by locating all of the aboveground tanks inside a dike or watertight warehouse capable of containing such a spill.

Table 1 presents estimated volume, direction and flow rate of potential spills at the facility. Spill volumes were calculated from estimates of the rate at which liquid

would be released and the length of time it would take to shut off the flow after the release is identified.

4.6 Secondary Containment Measures (40 CFR Part 112.7(c))

Warehouse Tank Storage

The aboveground tanks located inside of the watertight warehouse have a dilked secondary containment system located inside of the concrete building/warehouse with a concrete floor and doors that are watertight. The concrete building/ warehouse's diked containment and concrete floor are sufficiently impervious to store petroleum products for a short period of time. The storage capacity of concrete building/warehouse is over 110 percent of the volume of the largest tank contained within the dike (9,500-gallons). Assuming the catastrophic failure of the 9,500-gallon AST was to occur, the extra capacity of the secondary containment allows for a containment of precipitation if it would get into the building. In addition, if a tote or 55-gallon drum would leak, the oil would flow and pond on the building/warehouse's concrete floor until the oil in cleanup. Containment for precipitation is not required for the totes and 55-gallon drums since the tanks are located inside a watertight warehouse

Outside Tank Storage

One aboveground storage tank is located in a metal secondary containment basin located near the west side of the warehouse wall; the dike is approximately 16-foot by 7.5-foot by approximately 35-inches high. The dike walls and floor are sufficiently impervious to store petroleum products for a short period of time. The storage capacity of secondary containment area is over a 110 percent of the volume of the largest tank contained within the dike (2,000 gallons). Assuming a spill depth of 35-inches, the volume of the containment area is approximately 2,500 gallons (with the displacement volumes of the tanks accounted for). Assuming the catastrophic failure of the 2,000-gallon AST was to occur, the extra capacity of the secondary containment allows for an additional 12-inch of freeboard for containment of precipitation

Spills at the facility have been seldom and minor. The spills are generally less than five gallons and are contained and immediately cleaned up. Sorbent materials are stored at the facility. A list of spill response equipment is included in Appendix D. These spill supplies are inventoried monthly and restocked as necessary.

4.7 Facility Drainage (40 CFR Part 112.7(e) (l) (i-v))

Outside Tank Storage

There is no drainage from the outside tank's secondary containment. Rainwater is usually allowed to evaporate from inside the diked area; however, rainwater when discharged from the southwest corner of the dike flows towards the onsite storm

sewer system. Soil percolation, runoff and evaporation are the most common mechanisms for moisture removal from the site. The drainage from the transfer areas is also discharged to the southwest towards the onsite storm sewer system.

(i) No drainage is allowed from the dike, no drains control the drainage.

(ii) No drains are in the containment basin.

(iii) The entire AST facility is located within the diked area. All drainage/run-off for areas outside of the diked area remains on site and pools until it is soaked into the ground or evaporates.

iv) There are no diversionary systems on site.

v) Pumps are used for drainage from the containment basin.

4.8 Bulk Storage Tanks (40 CFR Part 112, 7(e) (2) (i-xi))

The warehouse aboveground tanks consist of four (4) 8,000-gallons tanks, seventy-seven (77) 9,500-gallon tanks, twelve (12) 2,200-gallon tanks, and numerous totes and 55-gallon drums inside a watertight warehouse. One (1) 2,000-gallon diesel tank is located outside on the west side of the warehouse building. The locations of the loading and unloading areas and the storage tanks are shown on the site facility map.

i. All but four tanks are of steel construction and compatible with their stored contents in accordance with API specifications. The four tanks are of poly construction

ii. All of the aboveground tanks have secondary containment that is capable of containing the largest tank with enough freeboard for precipitation. All containment zones are sufficiently impervious to stored product.

iii. Plant effluents are not discharged from the facility. Rainwater is normally allowed to evaporate within the containment basins. If rainwater is to be discharged, the following procedures are followed:

(A) Rainwater is inspected to meet water quality standards prior to discharge.

(B) Portable sump pumps are placed near the south corner of the containment area and rainwater is pump over the dike to the south.

(C) The portable sump pumps are removed after discharging.

(D) Records are kept of discharge events (see Appendix A).

iv. There is one 6,000-gallon buried underground storage tank at this facility to contain a railcar discharge

v. Since the bulk tanks are constantly full of product, valid pressure testing is impossible and not allowed under NFPA 30. Tanks are, instead, visually inspected on a monthly basis and comparison records maintained. The inspection includes seams, rivets, bolts, gaskets, nozzle connections, foundation, and/or supports. An inspection form is included in Appendix A

vi. No internal heating coils are used in the storage tanks.

vii. All aboveground tanks have overfill alarms.

viii. There are no discharge disposal systems in operation at this facility.

ix. Observed oil leaks and spills are promptly corrected.

x. All portable or mobile storage tanks at the facility are empty or inside the containment area at all times. The facility is divided into three areas. Area one is where the dispensing pumps, shipping/receiving dock and truck tank filling rack is located. Area "one" oil is not stored on racks. Containers are positioned for truck loading to customers. Area two consists of palletized 55 drums, 5 gallon buckets and case products store in racks. Area "two" has seven single storage racks of oil products of 55 gallon, 5 gallon and case products are stored for customer resale. The amount of drums present at one time will vary from 1,200 to 2,400 units. Along the west wall there are 7 overhead doors for shipping/receiving of products. The drums are secured within the racks, all though, at times, palletized 55-gallon drums are on the floor. The company's policy is to place the drums away from heavy forklift traffic. Fork lift operator training re-emphasizes container placement away from heavy forklift traffic lanes and the need for extra caution when around containers. If there were a puncture from a forklift the maximum spill amount would be 55-gallons. If a pallet was dropped the potential spill could total 4 drums or 220 gallons. The spill policy is to announce over the intercom for team assistance. It is our policy to shut the overhead door and apply "socks" in front of the opening to the spill could leave the building. Area 3 consists of racked of palletized 55 gallon drums, 260 gallon totes and some case products. Area three has twelve single storage racks of oil products of 265 gallon totes, 55 gallon, 5 gallon and case products are stored for customer resale. Along the west wall there is one overhead door used for brining in empty tanks for cleaning and repair not for shipping/receiving of products. The door is not located in the vicinity of the storage racks. The amount of drums present at one time will vary from 1,200 to 2,300 units. The total number to totes can max out to 325 but most likely less

that that amount. Along the east wall there are no overhead doors. The totes, drums and smaller containers are secured within the racks, all though at times, palletized 55 gallon drums and totes may be placed on the floor. The company's policy is to place the totes, drums and case product away from heavy forklift traffic. Fork lift operator training re-emphasizes container placement away from heavy forklift traffic lanes and the need for extra caution when around containers. If there were a puncture from a forklift the maximum amount would be a 265 gallon tote. If a tote was dropped the potential spill would be 265 gallons. The spill policy is to announce over the intercom for team assistance and apply "socks" in where the spill is located to minimize spread. It is very unlikely that the oil would spill outside the building.

4.9 Facility Transfer Operations (40 CFR Part 112.7(e) (3) (i-v))

i. All piping at the aboveground storage facility is aboveground and does not require wrapping or catholic protection. The pipes are painted to protect from corrosion.

ii. All out-of-service or stand-by pipelines are capped.

iii. There is an aboveground piping inspection program permitting prompt detection of spills and leaks. These inspections include valves, pumps, nozzles, meters, air- eliminators, flange joints, valve glands and bodies, pipeline supports, locking of valves, catch pans, and metal surfaces. A copy of the inspection form is included in Appendix A. The pipelines are inspected on a daily basis.

iv. All aboveground pipe supports are designed to minimize abrasion and corrosion and allow for expansion and contraction.

v. The facility will install signs warning vehicles of the aboveground piping at the loading/unloading areas.

4.10 Loading/Unloading Operations (40 CFR Part 112.7(e) (4) (i-iv))

i. Facility loading/unloading procedures meet the minimum requirements and regulations of the Department of Transportation (DOT). All drivers are trained to handle hazardous substances in accordance with state and federal DOT regulations. Records of DOT inspections and DOT documentation are kept on file at the facility.

ii. Secondary containment for the loading/unloading operations is facilitated by conducting all loading/unloading operations within the building's concrete floor, which drains into a 6,000-gallon underground storage tank (UST), which is larger than the volume of the largest compartment (3,500-gallons) of a transport

unloading at the facility. The railroad car transfer area also drain into the 6,000-gallon UST. The railroad car unloading area's secondary containment system consists of clay basin formed by concrete retaining walls, the warehouse building, and the railroad tracks. The soil is sufficiently impervious to control the spread of the oil to navigator waters where outside contractors can clean up the spill within 72 hours. The storage capacity of the basin is 31,000 gallons in addition to the 6,000 gallons underground tank that uses a catch basin located under the railroad cars during oil transfer. Total containment capacity for the railroad car basin is 37,000 gallons.

iii. The facility will install signs to warn vehicles from prematurely departing before disconnecting from the transfer lines and warn of aboveground piping at the facility.

iv. Drain and outlet lines are inspected prior to filling and departure. The company has written procedures for unloading/loading product from tank trucks and railroad cars (see Appendix A).

4.11 Inspections and Records (40 CFR Part 112.7(e) (8))

All records of inspections are signed by appropriate personnel and maintained at the facility for at least three years. Written procedures for inspections are included in Appendix A of this SPCC Plan.

4.12 Security (40 CFR Part 112.7(e)(9)(i-v))

i. The entire facility is inside a lock building and all tank valves and control panels are securely locked when not attended as a part of operational procedure (see also parts ii-iv below). Also, the local police patrol the site on a regular basis.

ii. All master flow drain valves that permit direct outward flow of the tanks' contents to the surface are securely locked in the closed position when in non-operating or stand-by status.

iii. Starter controls on pumps are located inside the secured electrical panel. Access to the electrical panel is restricted to Lubrication Technologies personnel. The controls are locked and the power shut off when unattended.

iv. Lighting is adequate for the facility and permits discovery of spills during hours of darkness and helps prevent vandalism (facility lighting is shown on the site map).

v. Rail tankers are scheduled for arrival by Lube-Tech a head of time. Once they arrive, heavy padlocks are applied to the valves to prevent sabotage or deliberate release of oil from the tankers.

4.13 Personnel Training (40 CFR Part 112.7(e) (10) (i-iii))

Lubrication Technologies provides spill response and prevention training to personnel who work with and handle oil and oil products. Personnel are instructed in the following:

- Proper operation and maintenance of equipment to prevent oil discharge.
- Applicable pollution control regulations.
- Proper procedure to follow, as outlined in the SPCC Plan, in case of an oil spill at the facility.
- All drivers are instructed in the proper handling of hazardous materials in accordance with federal and state DOT.

Scott Bergman is the coordinator for the tank, drum and container management program and is responsible for enforcing this SPCC Plan company wide and making sure that it is properly updated as necessary. He is responsible for maintaining the proper spill control supplies and for spill prevention. He is also responsible for notifying the appropriate officials when a spill occurs.

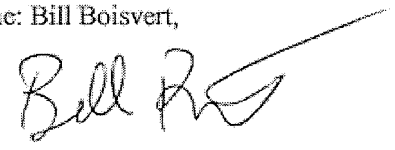
Lubrication Technologies schedules and conducts periodic spill prevention training. The training includes the proper operation of the facility's equipment and insuring that personnel understand the SPCC Plan. Procedures for loading/unloading operations inventory records, spill clean-up, equipment inspections, and spill reporting would be part of this training. In addition, the management Lubrication Technologies updates all personnel on new guidelines put out by any of the regulatory agencies that are relevant to the operation of this facility.

vi. Certification [40 CFR Part 112.71

Management Approval

Full approval is extended by Management at a level with authority to commit the, necessary resources toward the full implementation of the SPCC Plan for the facility named below. This SPCC Plan will be maintained at the facility and amended as necessary.

Printed Name: Bill Boisvert, Title Division Operation Officer

Signature  Date October 23, 2009

Lubrication Technologies 858 -St. Paul, Minnesota

Facility Name

Professional Engineer Certification [40 CFR Part 112.3(d)]

By means of this certification, I attest that I am familiar with the requirements of the provisions of 40 CFR Part 112, that I or my designated agent have visited and examined the facility, that this SPCC plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the requirements of 40CFR 112, that procedures for required inspections and testing have been established and the Plan is adequate for the facility.

Lubrication Technologies -St. Paul, Minnesota
Facility Name

10-28-09

Martin D. Bonnell, PE
Professional Civil Engineer
MN#14010
Vieau Associates, Inc.

Revision Date

SPCC Plan Owner's Review [40 CFR Part 112.5(b)]

As required by 40 CFR, Part 112.5(b), "a review and evaluation of the SPCC Plan at least once every five years from the date such facility becomes subject to this part," is required of the owner.

If major changes to the facility have occurred since the last review, the plan must be updated and recertified by a registered Professional Engineer.

If no amendment is necessary, you should indicate on the SPCC Plan that a review was conducted on a certain date, along with your signature and title stating that, "No amendment is necessary as per 40 CFR, Part 112.5(b)."

(Please Print or Type)

Facility Name Lubrication Technologies -St. Paul, Minnesota

Reviewed On: 10/23/09 Administrative Amendment No. 1

Signature Bill Boisvert

Bill Boisvert – Division Operation Officer

The next review date will be: 5 years later

Certification of Full SPCC Plan Implementation

Facility Certification

I hereby certify that the SPCC Plan for the facility named below has been fully implemented to the best of my knowledge and belief on the date shown below.

(Please Print or Type)

Date of Full SPCC Plan Implementation

Lubrication Technologies -St. Paul. Minnesota
Name of Facility

Printed Name: Bill Boisvert

Title: Division Operations Officer

Signature 

Date Signed: October 23, 2009

Consultant Certification

As the fully authorized representative of the above named facility, I hereby certify that the SPCC Plan for this facility has been fully implemented on the date shown above and that the photographic evidence submitted as proof of full SPCC Plan implementation is authentic to the best of my knowledge and belief.

See Attached signed letter dated 10/23/09 from Martin Bonnell.

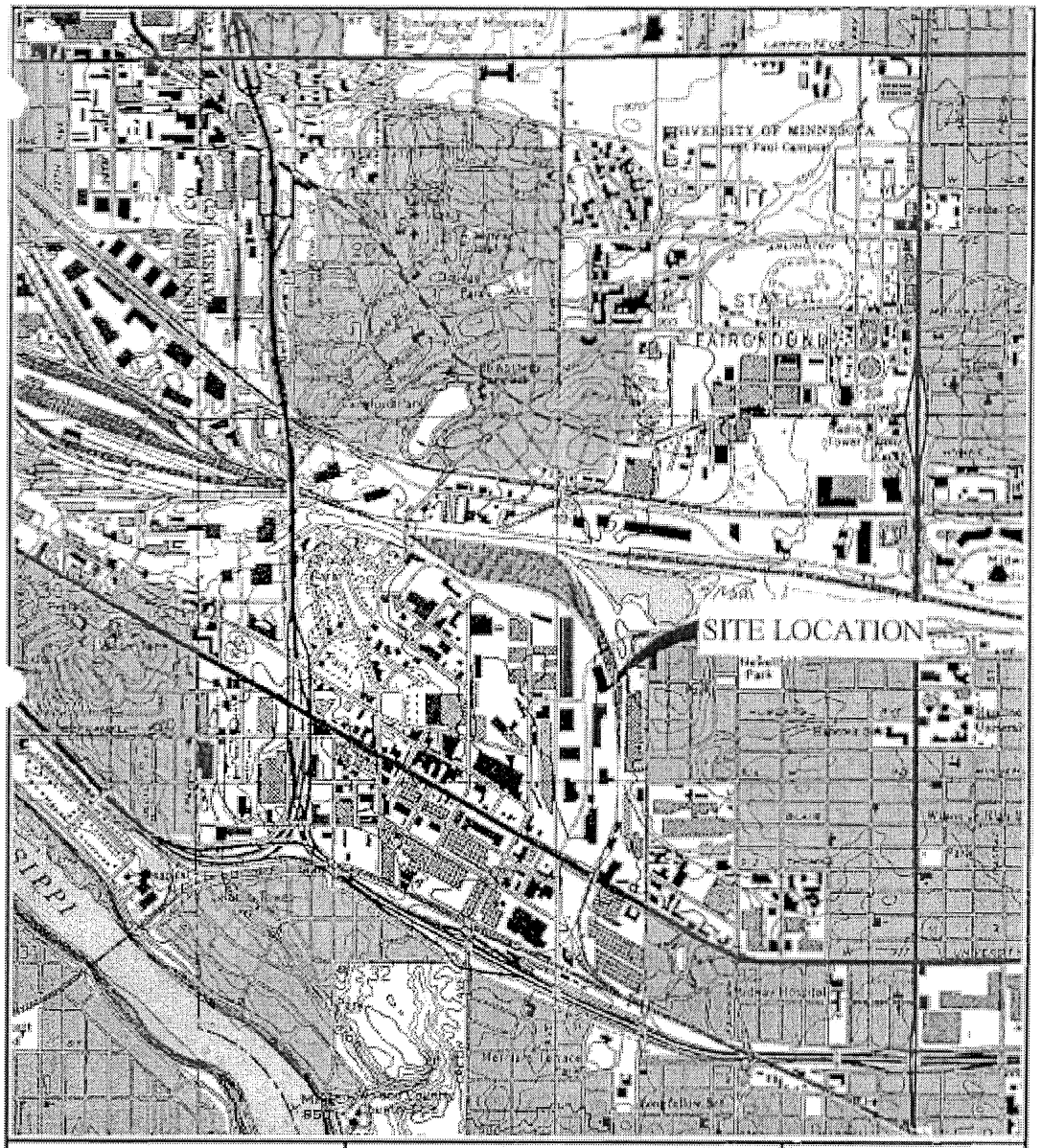
Martin D. Bonnell, PE Date
Minnesota License # 14010
Vieau Associates Inc.

Amendment 10-23-09

The plan has been amended to include RR car transfer information and security action items upon tank arrival on premise.

In addition, the SPPC plan has included action items that the company will to control the spills of totes and 55 gallon drums in the warehouse.

A 37,000 gallon RR car spill containment system has been installed October 2009 to control tanker spills up to the largest tanker on property or 28,000 gallons.


SITE LOCATION
Scale: 1"=2000'
0'
2000'
N
FIGURE 1
SITE LOCATION MAP
HALLMAN OIL COMPANY
858 TRANSFER ROAD
ST. PAUL, MN
VEAU ASSOCIATES INC
Project No: 2008.10

Current October 2009

TABLE 1
Tank Characteristics / Spill Prediction

Tank #	Volume (gals)	Contents	Material of Construction	External Protection	Level Indicators	Secondary Containment Volume (gals)	Type of Failure	Volume of Spill (gals)	Flow Direction	Flow Rate
(G14) 1	8000	Windshield Wash	Poly	N/A	Visual Gauge	14,485	Overfill Catastrophic	200 8000	To Containment	200 NA
(G13) 2	8000	Antifreeze	Poly	N/A	Visual Gauge	14,485	Overfill Catastrophic	200 8000	To Containment	200 NA
(G12) 3	8000	Antifreeze	Poly	N/A	Visual Gauge	14,485	Overfill Catastrophic	200 8000	To Containment	200 NA
(G11) 4	8000	Antifreeze	Poly	N/A	Visual Gauge	14,485	Overfill Catastrophic	200 8000	To Containment	200 NA
(G10) 5	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(G-9) 6	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(G-8) 7	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(G-7) 8	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(G-6) 9	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(G-5) 10	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(G-4) 11	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(G-3) 12	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(G-2) 13	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(G-1) 14	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(A-14) 15	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(A-13) 16	9500	Petroleum	Steel	Paint	Visual Gauge	14,485	Overfill	200	To	200

TABLE 1 Tank Characteristics / Spill Prediction										
Tank #	Volume (gals)	Contents	Material of Construction	External Protection	Level Indicators	Secondary Containment Volume (gals)	Type of Failure	Volume of Spill (gals)	Flow Direction	Flow Rate
		Other					Catastrophic	9500	Containment	NA
(A-12) 17	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(A-11) 18	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(A-10) 19	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(A-9) 20	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(A-8) 21	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(A-7) 22	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(A-6) 23	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(A-5) 24	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(A-4) 25	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(A-3) 26	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(A-2) 27	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(A-1) 28	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 8500	To Containment	200 NA
(B-14) 29	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(B-13) 30	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(B-12) 31	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(B-11) 32	9500	Petroleum	Steel	Paint	Visual Gauge	14,485	Overfill	200	To	200

TABLE 1 Tank Characteristics / Spill Prediction										
Tank #	Volume (gals)	Contents	Material of Construction	External Protection	Level Indicators	Secondary Containment Volume (gals)	Type of Failure	Volume of Spill (gals)	Flow Direction	Flow Rate
		Other					Catastrophic	9500	Containment	NA
(B-10) 33	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(B-9) 34	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(B-8) 35	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(B-7) 36	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(B-6) 37	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(B-5) 38	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(B-4) 39	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(B-3) 40	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(B-2) 41	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(B-1) 42	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(C-14) 43	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(C-13) 44	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(C-12) 45	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(C-11) 46	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(C-10) 47	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(C-9) 48	9500	Petroleum	Steel	Paint	Visual Gauge	14,485	Overfill	200	To	200

TABLE 1 Tank Characteristics / Spill Prediction										
Tank #	Volume (gals)	Contents	Material of Construction	External Protection	Level Indicators	Secondary Containment Volume (gals)	Type of Failure	Volume of Spill (gals)	Flow Direction	Flow Rate
		Other					Catastrophic	9500	Containment	NA
(C-8) 49	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(C-7) 50	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(C-6) 51	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(C-5) 52	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(C-4) 53	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(C-3) 54	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(C-2) 55	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(C-1) 56	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(D-14) 57	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(D-13) 58	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(D-12) 59	9500	Anti-Freeze	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(D-11) 60	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(D-10) 61	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(D-9) 62	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(D-8) 63	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(D-7) 64	9500	Petroleum	Steel	Paint	Visual Gauge	14,485	Overfill	200	To	200

TABLE 1 Tank Characteristics / Spill Prediction										
Tank #	Volume (gals)	Contents	Material of Construction	External Protection	Level Indicators	Secondary Containment Volume (gals)	Type of Failure	Volume of Spill (gals)	Flow Direction	Flow Rate
		Other					Catastrophic	9500	Containment	NA
(D-6) 65	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(D-5) 66	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(D-4) 67	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(D-3) 68	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(D-2)69	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(D-1) 70	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(E-11) 71	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(E-10) 72	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(E-9) 73	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(E-8) 74	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(E-7) 75	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(E-6) 76	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(E-5) 77	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(E-4) 78	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(E-3) 79	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(E-2) 80	9500	Petroleum	Steel	Paint	Visual Gauge	14,485	Overfill	200	To	200

TABLE 1 Tank Characteristics / Spill Prediction										
Tank #	Volume (gals)	Contents	Material of Construction	External Protection	Level Indicators	Secondary Containment Volume (gals)	Type of Failure	Volume of Spill (gals)	Flow Direction	Flow Rate
		Other					Catastrophic	9500	Containment	NA
(E-1) 81	9500	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 9500	To Containment	200 NA
(F-1) 82	2200	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 2200	To Containment	200 NA
(F2) 83	2200	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 2200	To Containment	200 NA
(F-3) 84	2200	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 2200	To Containment	200 NA
(F-4) 85	2200	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 2200	To Containment	200 NA
(F-5) 86	2200	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 2200	To Containment	200 NA
(F-6) 87	2200	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 2200	To Containment	200 NA
(F-7) 88	2200	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 2200	To Containment	200 NA
(F-8) 89	2200	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 2200	To Containment	200 NA
(F-9) 90	2200	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 2200	To Containment	200 NA
(F-10) 91	2200	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 2200	To Containment	200 NA
(F-11) 92	2200	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 2200	To Containment	200 NA
(F-12) 93	2200	Petroleum Other	Steel	Paint	Visual Gauge	14,485	Overfill Catastrophic	200 2200	To Containment	200 NA
(H-1) 94	2000	Diesel	Steel	Paint	Visual Gauge	2500	Overfill Catastrophic	2000	Containment	200 NA
Truck Transfer	3500	Any	Steel	Paint	Visual Gauge	6000	Catastrophic	28000	Containment	200

TABLE 1 Tank Characteristics / Spill Prediction										
Tank #	Volume (gals)	Contents	Material of Construction	External Protection	Level Indicators	Secondary Containment Volume (gals)	Type of Failure	Volume of Spill (gals)	Flow Direction	Flow Rate
RR car Transfer	28000	Any	Steel	Paint	Visual Gauge	37000	Catastrophic	28000	Containment	200